IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

FTX TRADING LTD., et al., 1 Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

ALAMEDA RESEARCH LTD., WEST REALM SHIRES, INC., and WEST REALM SHIRES SERVICES, INC.,

Plaintiffs,

- against -

Adv. Pro. No. 23-50381 (JTD)

SAMUEL BANKMAN-FRIED, NISHAD SINGH, and ZIXIAO "GARY" WANG,

Defendants.

Ad. Ref. No. 1

CERTIFICATION OF COUNSEL

- I, Matthew B. McGuire, counsel to the above-captioned debtors and debtors-in-possession (the "<u>Debtors</u>"), hereby certify as follows to the best of my knowledge, information and belief:
- 1. On May 17, 2023, Plaintiffs, Alameda Research Ltd., West Realm Shires, Inc. and West Realm Shires Services, Inc., (the "Plaintiffs"), filed the Complaint for Avoidance and Recovery of Transfers and Obligations Pursuant to 11 U.S.C. §§ 105, 544, 547, 548 and 550 and Del. Code Ann. Tit. 6, §§ 1304 and 1305 and for Disallowance of Claims Pursuant to 11 U.S.C.

¹The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

- § 502 (the "Complaint") [Adv. D.I. 1] in the above-captioned adversary proceeding against Defendant Zixiao "Gary" Wang (the "Defendant" and, together with the Plaintiffs, the "Parties").
- 2. The Defendant has accepted service of the Complaint, effective May 24, 2023. The Defendant's deadline to respond to the Complaint was originally June 16, 2023.
- 3. The Parties have conferred and agree that the deadline for Defendant to respond to the Complaint shall be extended through August 15, 2023.
- 4. The Parties' stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is annexed hereto as **Exhibit 1** (the "Order").
- 5. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: June 8, 2023

Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire

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